

Message Text

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PAGE 01 ROME 17202 111728Z

40

ACTION TRSE-00

INFO OCT-01 EUR-12 ISO-00 EB-07 L-02 CIAE-00 INR-05

NSAE-00 RSC-01 PRS-01 PA-01 USIA-06 /036 W

----- 027302

P R 111658Z DEC 74

FM AMEMBASSY ROME

TO SECSTATE WASHDC PRIORITY 8615

INFO AMCONSUL MILAN

AMCONSUL NAPLES

C O N F I D E N T I A L ROME 17202

E.O. 11652: N/A

TAGS: EFIN, IT

SUBJECT: US-ITALY DOUBLE TAXATION CONVENTION

REF: A. ROME 17056 B. HENG-SACCHET TELECON OF DECEMBER 11

PASS TREASURY FOR NATHAN GORDON AND DONALD HENG

1. GOI MINFINANCE AND MINISTRY FOREIGN AFFAIRS CONCUR WITH CHANGE OF LANGUAGE IN PARAGRAPH 4 (PARA 6) OF REFTEL RE DRAFT JOINT PRESS COMMUNIQUE, AS FOLLOWS: QUOTE: THE LOCAL TAX ON INCOME OWED IN ITALY BY US RESIDENTS OR CORPORATIONS SHALL BE APPLIED ON THE BASIS OF THE ANNUAL TAX DECLARATION OF THE AFOREMENTIONED RESIDENTS OR CORPORATIONS. SUCH TAX IS NOT SUBJECT TO ANY WITHHOLDING AT THE SOURCE.END QUOTE.

2. CHANGES HAVE BEEN MADE AT US SUGGESTION TO AVOID POSSIBLE AMBIGUITY IN EARLIER ENGLISH TEXT RE NON-APPLICABILITY OF ANY WITHHOLDING REQUIREMENT ON ROYALTIES WHICH MAY BE SUBJECT TO ILOR. VOLPE

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Message Attributes

Automatic Decaptioning: X
Capture Date: 01 JAN 1994
Channel Indicators: n/a
Current Classification: UNCLASSIFIED
Concepts: n/a
Control Number: n/a
Copy: SINGLE
Draft Date: 11 DEC 1974
Decaption Date: 01 JAN 1960
Decaption Note:
Disposition Action: RELEASED
Disposition Approved on Date:
Disposition Authority: CunninFX
Disposition Case Number: n/a
Disposition Comment: 25 YEAR REVIEW
Disposition Date: 28 MAY 2004
Disposition Event:
Disposition History: n/a
Disposition Reason:
Disposition Remarks:
Document Number: 1974ROME17202
Document Source: CORE
Document Unique ID: 00
Drafter: n/a
Enclosure: n/a
Executive Order: GS
Errors: N/A
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From: ROME
Handling Restrictions: n/a
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ISecure: 1
Legacy Key: link1974/newtext/t19741243/aaaabkxk.tel
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Office: ACTION TRSE
Original Classification: CONFIDENTIAL
Original Handling Restrictions: n/a
Original Previous Classification: n/a
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Previous Classification: CONFIDENTIAL
Previous Handling Restrictions: n/a
Reference: 74 ROME 17056, 74 HENG-SACCHET, 74 TELECON OF DECEMBER 11
Review Action: RELEASED, APPROVED
Review Authority: CunninFX
Review Comment: n/a
Review Content Flags:
Review Date: 24 MAY 2002
Review Event:
Review Exemptions: n/a
Review History: RELEASED <24 MAY 2002 by ifshinsr>; APPROVED <26 MAR 2003 by CunninFX>
Review Markings:

Declassified/Released
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30 JUN 2005

Review Media Identifier:
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Review Withdrawn Fields: n/a
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